

**RICHARD ENGLE**

**Mustang, OK, 73064**

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2008 JUN 23 A 11: 41

June 16, 2008

Office of the General Counsel  
Federal Election Commission  
999 E. Street, N.W.  
Washington, DC 20463

MUR # 6028

Dear General Counsel,

I am hereby filing an official complaint against the Attorney General of Oklahoma, Drew Edmondson, for a violation of:

§ 110.4 Contributions in the name of another; cash contributions (2 U.S.C. 441f, 441g, 432(c)(2)).

(a) [Reserved]

(b) *Contributions in the name of another.*

(1) No person shall—

(i) Make a contribution in the name of another;

(ii) Knowingly permit his or her name to be used to effect that contribution;

(iii) Knowingly help or assist any person in making a contribution in the name of another; or

(iv) Knowingly accept a contribution made by one person in the name of another.

This complaint is based on information I have included with this letter.

On April 16, 2007 Attorney General Drew Edmondson sent a letter to the Executive Director of the State Ethics Commission wherein he admits violating the above statute by making an April 8, 2004 contribution to then candidate for United States Senate, Brad Carson and then an August 22, 2005 contribution to current United States Congressman, Dan Boren, both from his personal funds, only to have his Attorney General's campaign account reimburse him for the contribution.

This caused him to be front and center in directing his personal checking account to be used as a means to funnel money from his campaign account to these candidates without the public having knowledge of where the money actually originated from; thus, "knowingly permitting his name to be used to effect that contribution". I would submit that he did far more than permit his name to be used but he personally took a role in directing the activity.

He did not, and could not have made the contributions directly from his campaign, as candidate-to-candidate contributions are illegal under Oklahoma law. Paying directly and then reimbursing himself seems to be the preferred method of evading the law. The very law he is sworn to uphold.

I know these events happened a few years ago, but as a point of information for your investigation, I will tell you that the Attorney General was not forthcoming with this information until State Representative Mike Reynolds recently uncovered it. When informed of the violations, the Attorney General said he would research it, which he did and then subsequently made the reimbursements and admitted that he did, indeed, make a number of improper contributions

Sometime after Edmondson came forward and admitted this "violation", Rep. Reynolds discovered and released another list of "improper" contributions that the Attorney General had made and asked him to come clean on them as well. Edmondson refused to look into them and attacked Reynolds as someone desperately trying to be relevant. I tell you this because it is important for you to know that Edmondson has a pretty lengthy history of these types of "mistakes" that have illegally benefited other candidates across Oklahoma. So, this is not an isolated incident but is reflective of a pattern of behavior where the Attorney General believes nobody will effectively hold him accountable for his actions.


The Federal Election Commission has made a number of startling discoveries over the years in Oklahoma concerning "straw donors" that have resulted in some very high profile arrests and convictions - It seems that this is just another case of similar type of behavior. Mr. Edmondson is a powerful politician who seems to believe that he is above the law - doing whatever he wishes in spite of the limitations put on him by State and Federal law.

So far, there has been no law enforcement official in this state willing to file charges against this politician due to his position of power that he wields against his political enemies - please step forward and make sure that justice is done and the law was followed in this case.

Again, this is not a mere oversight, as he will most likely plea, but a deliberate repetitive behavior. A simple I'm sorry and a refund of the illegal contributions is, obviously, enough for his buddies in the Oklahoma law enforcement community - I hope you will review the facts, measure them against the law, and have the courage to initiate and complete an investigation.

Please advise me regarding your decision,

Thank you.

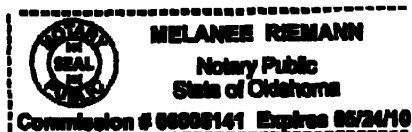


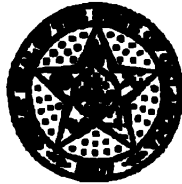
Richard Engle

This statement was signed and sworn to before me on the 14th day of June, 2008

Melanie Riemann

My Commission expires 5/24/10





**W. A. DREW EDMONDSON  
ATTORNEY GENERAL  
STATE OF OKLAHOMA**

**April 16, 2007**

*Ink*

**Ms. Marilyn Hughes  
Executive Director  
State Ethics Commission  
State Capitol  
Oklahoma City, Oklahoma**

**Dear Ms. Hughes:**

Based upon a recent conversation with you, I have determined that my interpretation of the ethics rules has been incorrect in a specific regard and that my campaign, in the 2006 election cycle, has made one expenditure and a number of reimbursements which were not proper. With that determination I have this date made a refund to the campaign for the following expenditures/reimbursements:

1. April 1, 2004, personal check to the Oklahoma House PAC reimbursed by the campaign in the amount of \$100.00.
2. April 8, 2004, personal check to Brad Carson for Senate reimbursed by the campaign in the amount of \$250.00.
3. June 3, 2004, personal check to the Jeff McMahan campaign reimbursed by the campaign in the amount of \$400.00.
4. January 25, 2005, personal checks to the Jerry McPeak campaign and the Ryan Kiesel campaign for \$100.00 each, reimbursed by the campaign in the amount of \$200.00.
5. April 5, 2005, personal check to the Oklahoma House PAC reimbursed by the campaign in the amount of \$100.00.
6. April 5, 2005, personal check to Senate Democrats reimbursed by the campaign in the amount of \$100.00.
7. July 29, 2005, personal check to the Scott Mescham campaign reimbursed by the campaign in the amount of \$250.00.

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8. August 22, 2005, personal check to Boren for Congress reimbursed by the campaign in the amount of \$100.00.

9. February 2, 2006, personal checks to the campaigns of Jerry Shoemaker, Dale Turner and Jerry McPeak for \$100.00 each reimbursed by the campaign in the amount of \$300.00.

10. April 22, 2006, personal check to the Frank Shurden campaign for a retirement roast reimbursed by the campaign in the amount of \$200.00.

11. May 25, 2006, personal check to the Jeff McMahan campaign reimbursed by the campaign in the amount of \$150.00.

12. August 25, 2006, personal check to the Jennifer Seal campaign reimbursed by the campaign in the amount of \$100.00.

All of the above expenditures and reimbursements involved events which I personally attended for the purpose of meeting people, particularly potential contributors. The campaign felt at the time that the reimbursements were permitted under 257:10-1-20.(a)(1)(c) as a reimbursement "for political activity." I now understand that the prohibition under 257:10-1-2(f)(1) takes precedence over the permissive language on expenditures.

All of the candidates listed above received personal checks and not campaign checks. No candidate would have known that my campaign would be reimbursing me for the event cost.

13. May 5, 2005, campaign check to the Jeff McMahan campaign for registration in a golf tournament in the amount of \$500.00.

While this also represented an event I attended for my own campaign purposes the use of a campaign check was not proper. This is the only instance where the Edmondson campaign directly wrote a check to another campaign account.

The reimbursements I received from the formation of the 2006 campaign in January 2004 to date total \$2,750.00. I have, this date, written a personal check to the Edmondson for Attorney General 2006 campaign account in that amount to fully refund these reimbursements. We will also be filing one or more amended reports to reflect this action.

If you or the Commission require any additional information about these transactions please let me know. Thank you for your assistance and advice in this matter.

Sincerely,



W. A. Drew Edmondson  
Attorney General

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